510(k) Summary

Date of Summary Preparation: 4.20.2009

SEP – 4 2009

1. Submitter's Identifications

Submitter's Name: Truly Instrument Limited
Address: Truly Industrial Area, Shanwei City, Guangdong Province, China
Contact Person: Manager Yang Jian-Hao
Telephone: 86-0660-3380070
Fax: 86-0660-3380377

2. Name of the Device

Device Classification Name: System, Measurement, Blood-Pressure, Non-invasive
Models: DW100, DW200, DW500, DW700, DW701M, DW702M, DW703
Classification Panel: cardio-vascular
Common/Usual Name: Automatic Wrist Blood Pressure Monitor
Product Code: DXN
Device Classification: Class II
Contraindications : N/A

3. The Perdicate Devices

a. Digibio Digital Blood Pressure Monitor, Model D11, K014141
b. Microlife Wrist Watch Blood Pressure Monitor, Model BP3MK1-3 (BPW100), K073398

4. Device Description

Truly Automatic Wrist Blood Pressure Monitor DW series, Models DW100, DW200, DW500, DW700, DW701M, DW702M, DW703 are designed to measure the systolic and diastolic blood pressure and pulse rate of an individual by using a non-invasive technique in which an inflatable cuff is wrapped around the wrist.

Our method to define systolic and diastolic pressure is similar to the auscultatory method but uses an electronic pressure sensor rather than a stethoscope and mercury manometer. The sensor converts tiny alterations in cuff pressure to electrical signals, by analyzing those signals to define the systolic and diastolic blood pressure and calculating pulse rate, which is a well-known technique in the market called the "oscillometric method".

Truly Automatic Wrist Blood Pressure Monitor DW series are single-mounted devices of the main unit and cuff unit. ABS is used to outer housing of the main unit. The preformed cuff unit, which is applicable to wrist circumference approximately between 135 and 220 mm, includes the inflatable bladder and

nylon shell. All models of the wrist blood pressure monitor use a single size of cuff. The device consists of the microprocessor, the pressure sensor, the operation keys, the pump, the electromagnetic deflation control valve and the LCD. The subject devices are powered by two AAA alkaline batteries.

The device also compares the longest and the shortest time intervals of detected pulse waves to mean time interval and displays a warning signal with the reading to indicate the detection of irregular pulse rhythm when the difference of the time intervals is over 25%.

5. Intended use of device

Truly Automatic Wrist Blood Pressure Monitor DW series, Models DW100, DW200, DW500, DW700, DW701M, DW702M, DW703 are a series devices intended to measure the systolic and diastolic blood pressure and pulse rate of an adult individual by using a non-invasive technique in which an inflatable cuff is wrapped around the wrist.

The devices features include irregular pulse rhythm detection during measurement, and display a warning signal with the reading once the irregular heartbeat is detected.

6. Summary of Substantial Equivalence

Table 1: The difference between Truly Automatic Wrist Blood Pressure Monitor DW series and Digibio Digital Blood Pressure Monitor, Model D11.

Parameter	Predicate Devices D11	DW 100	DW 200	DW 500	DW 700	DW 701M	DW 702M	DW 703
Measurement algorithm Method	Oscillometric method	No change ,all same						
Measurement site of body	Arm	Wrist						
Pressure Sensor	MPS-2107	No change ,all same						
Cuff	Arm cuff	Wrist cuff.						
Software		D11 software + Irregular heartbeat detection.						
Irregular heartbeat detection		More than ±25% to the mean interval of pulse intervals. About the more detailed description of the IH detection algorithm, please refer to "Software validation report I-5. Algorithm description 4. Determination method of irregular heartbeat". DW701M, DW702M and DW703 have the IH feature.						
Memory Size	2 x 60	2 x 60	2 x 60	1 x 99	1 x 99	4 x 99	4 x 99	1 x 99
Measurement Pressure Range	20 ~ 280 mmHg	No change ,all same						
Measurement Pulse Range	40 ~ 195 beats/min	No change ,all same						
Measuring	1 mmHg	No change ,all same						

Parameter	Predicate Devices D11	DW 100	DW 200	DW 500	DW 700	DW 701M	DW 702M	DW 703
resolution								
Accuracy Pressure	±3mmHg	No change ,all same						
Accuracy Pulse	±5%	No change ,all same						
Pressurization Source	Automatic internal pump	No change ,all same						
Cuff Deflation	Automatic deflation	No change ,all same						
Operating Environment	10~40℃ 15~90%RH	No change ,all same						
Power	4X 1.5V AAA	2 x 1.5V AAA						
Hardware power circuit	6V power voltage change to 4V	3V power voltage change to 4V						
Hardware other circuit		No change ,all same						
Electronic element (power circuit)	DC-DC BL8503 and relation element	DC-DC BL8530 and relation element						
Electronic element (other circuit)		No change ,all same						
PCB	difference	There is difference from D11, but all PCB are same in the wrist blood pressure monitor DW series.						
Display Type	Liquid crystal display	No change ,all same						
Cover		Difference						

Table 2: The difference between Truly Automatic blood pressure monitor DW series and Microlife Wrist Watch Blood Pressure Monitor, Model BP3MK1-3 (BPW100).

Parameter	Predicate Devices BP3MK1-3 (BPW100)	DW 100	DW 200	DW 500	DW 700	DW 701M	DW 702M	DW 703
Measurement Method	Oscillometric Method	No change - the same						
Pressure Sensor	Capacitive	No change - the same						
Measurement Range: BP	30~280mmHg	20 ~ 280 mmHg						
Measurement Range: BP	40~200 beats/min	40 ~ 195 beats/min						

Parameter	Predicate Devices BP3MK1-3 (BPW100)	DW 100	DW 200	DW 500	DW 700	DW 701M	DW 702M	DW 703
Measuring resolution	1mmHg	No change - the same						
Accuracy Pressure	±3mmHg	No change - the same						
Accuracy Pulse	±5%	No change - the same						
Pressurization Source	Automatic internal pump	No change - the same						
Cuff Deflation	Automatic deflation	No change - the same						
Memory Size	99	2 x 60	2 x 60	1 x 99	1 x 99	4 x 99	4 x 99	1 x 99
Irregular Heartbeat Detection	More than ±25% to the mean interval of pulse intervals	DW701M, DW702M and DW703 have the IH feature.						
Power Source	2 X1.5V AAA batteries	No change - the same						
Operating Environment	10~40℃ 15~90%RH	No change - the same						
Cuff Attachment Method	By plastic hose connected to monitor	No change - the same						
Display Type	Liquid crystal display	Liquid crystal display						

7. Conclusions

The subject devices have all features of the predicate device D11 except the new features of irregular heartbeat detection, wrist cuff and the battery power. These differences do not affect the safety and effectiveness of the subject devices.

Irregular heartbeat detection technology is same as what is used Microlife Wrist Watch Blood Pressure Monitor, Model BP3MK1-3 (BPW100), K073398.

Thus, the subject devices are substantially equivalent to the predicate devices.

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
10903 New Hampshire Avenue
Document Control Room –WO66-G609
Silver Spring, MD 20993-0002

Truly Instrument Co., Ltd.
c/o Mr. Yang Jian-Hao
Manager
Truly Industrial Area
Shanwei, Guangdong 516600
China

SEP – 4 2009

Re: K091415
Trade/Device Name: Truly Automatic Wrist Blood Pressure Monitor Models DW100, DW200, DW500, DW700, DW701M, DW702M and DW703
Regulatory Number: 21 CFR 870.1130
Regulation Name: Noninvasive Blood Pressure Measurement System
Regulatory Class: Class II (Two)
Product Code: DXN
Dated: Undated
Received: August 7, 2009

Dear Mr. Yang:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please go to http://www.fda.gov/AboutFDA/CentersOffices/CDRH/CDRHOffices/ucm115809.htm for the Center for Devices and Radiological Health's (CDRH's) Office of Compliance. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm.

Sincerely yours,

For Bram D. Zuckerman, M.D.
Director
Division of Cardiovascular Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

TRULY®

Truly Instrument Limited

Indication for Use

510(k) Number (if known):

Device Name: Truly Automatic Wrist Blood Pressure Monitor DW Series,
Models DW100,DW200,DW500,DW700,DW701M,DW702M,DW703

Indication For Use:

Truly Automatic Wrist Blood Pressure Monitor ,Models DW100, DW200, DW500, DW700, DW701M, DW702M, DW703 are a series devices intended to measure the systolic and diastolic blood pressure and pulse rate of an adult individual by using a non-invasive technique in which an inflatable cuff is wrapped around the wrist.

The devices features include irregular pulse rhythm detection during measurement, and display a warning signal with the reading once the irregular heartbeat is detected.

Prescription Use ____ OR Over the Counter Use ____X____.

(21 CFR Part 801 Subpart D) (21 CFR Part 801 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE; CONTINUE ON ANOTHER PAGE IF NEEDED)

Concurrence of CDRH, Office of In Vitro Diagnostic Device Evaluation and Safety (OIVD)

Division Sign-Off
Office of In Vitro Diagnostic Device
Evaluation and Safety

510(k) K091415

HongKong: 2/F, Chung Shun Knitting Centre, 1-3 Wing Yip Street, Kwai Chung, N.T., Hong Kong
TEL: (852) 2487 9803 (20 Lines) FAX: (852) 2146 5756
URL: http://www.trulyinstrument.com E-MAIL: healthcare@truly.com.hk
China: Truly Industrial Area .ShanWei City. Guangdong Province ,China
TEL:86-0660-3380070 FAX:86-0660-3380377